

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

LUIS SEGOVIA, *et al.*,  
 Plaintiffs,  
 v.  
 BOARD OF ELECTION COMMISSIONERS  
 FOR THE CITY OF CHICAGO, *et al.*,  
 Defendants.

15-cv-10196  
 Judge Joan B. Gottschall

## FEDERAL DEFENDANTS' CROSS-MOTION FOR SUMMARY JUDGMENT

Date: October 19, 2016

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**FEDERAL DEFENDANTS' CROSS-MOTION FOR SUMMARY JUDGMENT**

Defendants the United States of America, Ashton Carter in his official capacity as the Secretary of Defense, the Federal Voting Assistance Program, and Matt Boehmer, in his official capacity as Director of the Federal Voting Assistance Program (together the "Federal Defendants"), hereby move for summary judgment pursuant to Federal Rule of Civil Procedure 56. The relevant authority and argument supporting this motion are set forth in the Memorandum in Support of Federal Defendants' Cross-Motion for Summary Judgment, and in Opposition to Plaintiffs' Second Motion for Summary Judgment, filed herewith.

Further, in accordance with Local Rule 56.1(a)(3), Federal Defendants incorporate the statement of facts previously filed by the Federal Defendants, (ECF No. 51-4). Federal Defendants also incorporate all facts and arguments set forth in their Memorandum in Support of Their Motion to Dismiss (ECF No. 39); Federal Defendants' Combined Memorandum Reply in Support of Their Motion to Dismiss, in Opposition to Plaintiffs' Motion for Summary Judgment, and in Support of Their Cross-Motion for Summary Judgment, (ECF No. 51); and Federal Defendants' response to the statement of facts previously filed by Plaintiffs, (ECF No. 51-5).

For the reasons set forth in the memorandum of law filed herewith and in the foregoing materials, the Federal Defendants' Cross-Motion should be granted and Plaintiffs' Motion for Summary Judgment should be denied as against Federal Defendants.

Dated: October 19, 2016

Respectfully submitted,  
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